

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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RIZWAN RAJA,

Plaintiff,

19-cv-01328 (AMD)

-Against-

JOHN W. BURNS and THE CITY OF NEW YORK,

Defendants.

X-----X

DECLARATION OF DANIEL L. ACKMAN

DANIEL L. ACKMAN, an attorney duly admitted to practice law in the Courts of the State of New York and this Court, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am an attorney admitted to practice before the courts of the State of New York and the United States District Court for the Southern District of New York. I am Counsel for Plaintiff and I make this declaration in support for plaintiff's motion for partial summary judgment as to liability based on personal knowledge and to transmit certain true and correct copies of the following documents as exhibits:

PX 1 E-mail from T. Jones to R. Raja dated March 1, 2019

PX 2 Summary Suspension Letter from J.W. Burns to R. Raja date Feb. 28, 2019 with exhibits

PX 3 Pertinent pages from the trial transcript of In the matter of OFFICE OF ADMINISTRATIVE TRIALS v. RIZWAN RAJA, OATH Ind. # 191903

PX 4 Holohan Incident Report regarding Alam, dated December 5, 2017

- PX 5 Holohan incident concerning Siddiquee and Adu, dated March 14, 2018
- PX 6 Letter Brief submitted by Raja to OATH dated March 14, 2019 with attached Declarations and Exhibits
- PX 7 Declaration by R. Raja, submitted to OATH and dated March 14, 2019.
- PX 8 Contemporaneous Notes by R. Raja
- PX 9 OATH Petition in In the matter of OFFICE OF ADMINISTRATIVE TRIALS v. RIZWAN RAJA, OATH Ind. # 191903, dated March 19, 2019 and exhibits not already included in PX 2.
- PX 10 OATH Discovery Demands dated March 19, 2019
- PX 11 Designation Letter from J.W. Burns dated March 26, 2019
- PX 13 Letter from D. Ackman to ALJ Casey re Holohan Incident Reports, dated April 2, 2019

2. At the end of the OATH Trial, Judge Casey rule on the propriety of the summary suspension.

3. Instead, he asked the parties if they would agree to discuss possible settlement with another OATH ALJ, Kara Miller. After a series of conference calls between Judge Miller, the parties and counsel, with Raja still facing the possibility of a permanent ban, the parties reached a settlement, which was reduced to writing and signed on April 11, 2019.

Dated: New York, NY
June 11, 2019

_____/s/_____
Daniel Ackman